



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

SEP 03 2013

REPLY TO THE ATTENTION OF:

Andrew Hall
Division of Air Pollution Control
Ohio Environmental Protection Agency
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049


Dear Mr. Hall:

The U.S. Environmental Protection Agency has reviewed the draft Title V renewal permit, permit number P0105044, for Titan Tire Corporation of Bryan in Bryan, Ohio. To ensure that the source meets Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comment.

Emission units P002, P003, and P005 are controlled by baghouses and their emission limits assume uncontrolled emission factors and 99.0% control efficiency. However, the only monitoring requirements for these units are visible emission checks. To comply with the requirement for sufficient monitoring at 40 C.F.R. § 70.6(a), the permit must include further monitoring provisions such as pressure drop monitoring and bag leak detection systems. Pressure drop monitoring is required by the initial Title V permit, but the draft renewal permit's Statement of Basis does not explain why pressure drop monitoring is being replaced by visible emission checks.

We appreciate the opportunity to provide comments on this draft permit. If you have any questions, please feel free to contact me or have your staff contact Kaushal Gupta, of my staff, at (312) 886-6803.

Sincerely,


Genevieve Damico
Chief
Air Permits Section